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September 17, 1999 RECEIVED

SEP 17 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

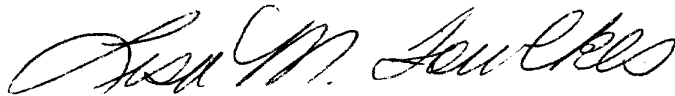
RE: Comments of the Commonwealth of Pennsylvania in response to
the FCC's Public Notice in GN Docket Nos. 90-7 and 89-573 (DA
99-1812)

Dear Ms. Salas:

On behalf of the Commonwealth of Pennsylvania (the "Commonwealth"),
enclosed herewith for filing are an original and seven (7) copies of the
Commonwealth's Comments in the above-captioned proceeding.

Kindly stamp and return to this office the enclosed copy of this filing designated
for that purpose. You may direct any questions concerning this material to the
undersigned, counsel to the Commonwealth of Pennsylvania.

Sincerely,



Lisa M. Fowlkes

Enclosures

No. of Copies rec'd 0+7
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■ HONOLULU ■ LAS VEGAS ■ MCLEAN ■ MIAMI

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Inter-Regional Channel) GN Docket Nos. 90-7 and 89-573
Re-Assignment Agreement) DA 99-1812
Submitted by Regions 20, 28 and 36)

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OFFICE OF THE SECRETARY

COMMENTS OF
THE COMMONWEALTH OF PENNSYLVANIA

The Commonwealth of Pennsylvania (the "Commonwealth"), through its attorneys, hereby files these Comments in response to the Wireless Telecommunications Bureau's (the "Bureau") Public Notice released on September 3, 1999, seeking comment on an Inter-Regional Channel Re-Assignment Agreement ("Agreement") submitted by the Regions 20, 28 and 36 Planning Committees. This Public Notice also seeks comment on a request from the Region 28 Planning Update Committee to accept the Region 28 Fifth Filing Window assignments that were included in the Agreement as amendments to Region 28's 821 MHz Public Safety Plan.¹

The Commonwealth is the licensee of a public safety communications system which utilizes, inter alia, conventional and trunked 800 MHz channels assigned by the Commission upon recommendation of the Region 28 and Region 36 Planning Committees in accordance with the Commission's rules governing the implementation of the Public Safety National Plan. The Commonwealth has been an active participant in this proceeding, particularly given the direct impact of Region 20's proposed frequency changes on the Commonwealth's

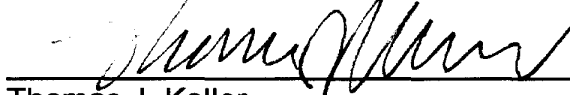
¹ Public Notice, "Wireless Telecommunications Bureau Seeks Comment On Inter-Regional Channel Re-Assignment Agreement Submitted By Regions 20, 28 and 36 in GN Docket Nos. 90-7 and 89-573," DA 99-1812 (released September 3, 1999) ("Public Notice").

system. Of particular concern to the Commonwealth throughout this proceeding has been the severe interference to its communications system caused by the Commission's improper grant of licenses of certain channels to Carroll County, Maryland ("Carroll County"). These interference problems have resulted in substantial delay in the completion of construction of the Commonwealth's statewide communications system.

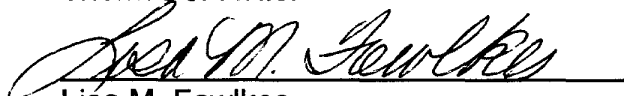
The Commonwealth has participated in the intense negotiations resulting in the proposed Agreement. After careful review, the Commonwealth finds that the Agreement addresses the interference concerns raised by the Commonwealth. Consequently, approval of the Agreement and the accompanying Fifth Filing Window will serve the public interest. Accordingly, the Commonwealth urges the Commission to expeditiously approve the proposed Agreement and Fifth Filing Window.

Respectfully submitted:

COMMONWEALTH OF PENNSYLVANIA



Thomas J. Keller



Lisa M. Fowlkes

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September 17, 1999

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17th day of September, 1999, I caused copies of the foregoing document to be served by first class mail, postage prepaid to the following:

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